


Although applicants respectfully disagree with this combination of references as discussed in the Request for Reconsideration filed on January 30, 2006, it is further noted that Ellis cannot properly be used as a reference since its effective U.S. filing date is March 27, 2003 while the effective U.S. filing date of the present application, based on the Right to Priority Under 35 USC §120 (referring back to the original application Serial No. 08/079,550) is June 22, 1993. As such, the original U.S. Filing date of the original great-grandparent application of the present application is almost ten years earlier than the effective U.S. filing date of the Ellis patent. Therefore, it is respectfully requested that Ellis be removed as a reference in the present matter. Once Ellis is removed, the only remaining reference used in the rejection is Nishi, and, as noted above, the Office Action already admits the shortcomings of Nishi in meeting the limitations concerning initiating the second erase command while the first erase operation is still being performed. Accordingly, based upon the removal of Ellis as a reference, it is respectfully submitted that all of claims 1-17 clearly define over the remaining document to Nishi and, accordingly, reconsideration and allowance of claims 1-17 is respectfully requested.

If the Examiner believes that there are any matters which can be resolved by way of either a personal or telephone interview, the Examiner is invited to contact Applicants' undersigned attorney at the number indicated below.

Applicants request any shortage or excess in fees in connection with the filing

of this paper, including extension of time fees, and for which no other form of payment is offered, be charged or credited to Deposit Account No. 01-2135 (Case: 566.32253CC8).

Respectfully submitted,  
**ANTONELLI, TERRY, STOUT & KRAUS, LLP.**



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Gregory E. Montone  
Registration No. 28,141

GEM/dks  
1300 N. Seventeenth Street  
Suite 1800  
Arlington, Virginia 22209  
Tel: 703-312-6600  
Fax: 703-312-6666  
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